

# **DEBORAH J. BLUM, ESQ.**

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July 1<sup>st</sup>, 2024

**Via CM/ECF**

The Hon. Judge Nicholas G. Garaufis  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: KEITH ALAN RANIERE v. UNITED STATES OF AMERICA**  
**Case Nos. 1:24-CV-02925 & 1:18-CR-00204**  
**Second Request for Extension of Time to Amend Pro Se Motion to**  
**Vacate Under 28 U.S.C. § 2255**

Dear Hon. Judge Garaufis:

My office represents Keith Alan Raniere (hereinafter referred to as "Mr. Raniere") solely in his 2225 application which is pending before the Court. Your Honor granted my office's request for a ninety (90) day extension of time to amend the 2255, [1259], to August 5<sup>th</sup>, 2024.

At this juncture, I am respectfully requesting that the Court grant a final extension of time<sup>1</sup> and allow my office an additional thirty-one (31) days to submit the amended filing on or before September 5<sup>th</sup>, 2024.

The reason for this request is after my initial request was made on May 6<sup>th</sup>, 2024, I had a death in the family of a close family member on May 18<sup>th</sup>. Apart from court appearances which could not be postponed, mainly trial/hearing matters, I took time off from my practice to grieve and process the loss. I recently returned to work full-time and realize that the undertaking of this matter requires additional time for completion.

Lastly, in my limited communication with Mr. Raniere, it has become apparent to me that I will need to set up an in-person legal visit with him to finalize the submission. During the one call that I had with Mr. Raniere, the call kept getting dropped and it is my understanding that this frequently occurs during his legal calls. Additionally, to my

<sup>1</sup> Absent extenuating circumstances.

knowledge, Mr. Raniere has only been permitted four (4) in-person legal visits by USP Tuscon in the past nine (9) months. As a result, an extension of time will enable me to have more effective communication with him.

Thank you very much in advance for this Honorable Court's consideration of this request. I can best be reached on my mobile phone, (845) 304-5312 or through email, deborah@deborahjblum.com.

Very truly yours,

*Deborah J. Blum*

Deborah J. Blum

Via Email and Facsimile

cc: Joseph Reccoppa  
Courtroom Deputy to  
The Hon. Judge Nicholas G. Garaufis

Via Email

Nicholas J. Moscow, Esq.  
Deputy Chief, Criminal Appeals  
United States Attorney's Office for The Eastern District of New York

**Application granted.**

**So Ordered.**

s/Nicholas G. Garaufis

**Hon. Nicholas G. Garaufis**

**Date:** 7/2/24